

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

-----X
In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

PROMESA

Title III

No. 17 BK 3283-LTS

as representative of

(Jointly Administered)

THE COMMONWEALTH OF PUERTO RICO, *et al.*

Debtors.¹

-----X

**AMENDED INFORMATIVE MOTION OF THE PUERTO RICO FISCAL AGENCY
AND FINANCIAL ADVISORY AUTHORITY REGARDING THE
APRIL 28-29, 2021 OMNIBUS HEARING**

To the Honorable United States District Judge Laura Taylor Swain:

Pursuant to the Court's *Order Regarding Procedures for April 28-29, 2021, Omnibus Hearing* [ECF No. 16475] and *Order Setting Briefing Schedule and Hearing Concerning Motion to Request the Issuance of a Temporary Restraining Order and, in the Alternative for, Preliminary Injunctive Relief* (Docket Entry No. 3) [ECF No. 16570], the Puerto Rico Fiscal Agency and Financial Advisory Authority ("AAFAF") respectfully states as follows:

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico ("Commonwealth") (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

1. Luis C. Marini-Biaggi of Marini Pietrantoni Muñiz LLC will appear telephonically at the April 28-29, 2021 hearing (the “Hearing”), and seeks to be heard to address questions and comments, if any, related to the Status Report of AAFAF, reserving the right to be heard on any other matter presented to the Court and to respond to any statements made by any party in connection with the above captioned Title III case to the extent it impacts the interests of AAFAF or the elected Government of Puerto Rico or any instrumentality thereof

2. Peter Friedman of O’Melveny & Myers LLP will appear telephonically at the Hearing, and seeks to be heard on the following matters:

- i. Government Parties’ Motion for Order Allowing Administrative Expense Claim for Amounts to be Paid to LUMA Energy by PREPA during Interim Period under Supplemental Agreement and the T&D Contract [Case No. 17-3283, ECF No. 16241; Case No. 17-4780, ECF No. 2417];
- ii. Motion to Request the Issuance of a Temporary Restraining Order and, in the Alternative, for Preliminary Injunctive Relief [ECF No. 3 in Adv. Proc. No. 21-00042].

3. Madhu Pocha of O’Melveny & Myers LLP will appear telephonically at the Hearing, and reserves the right to be heard on the following matter:

- i. Motion to Request the Issuance of a Temporary Restraining Order and, in the Alternative, for Preliminary Injunctive Relief [ECF No. 3 in Adv. Proc. No. 21-00042].

4. Carolina Velaz-Rivero of Marini Pietrantoni Muñiz LLC will appear telephonically at the Hearing and reserves the right to be heard on any matter presented to the Court and to respond to any statements made by any party in connection with the above-captioned Title III case to the extent it impacts the interests of AAFAF or the elected Government of Puerto Rico or any instrumentality thereof.

WHEREFORE, AAFAF respectfully requests that the Court take notice of the foregoing.

Dated: April 26, 2021.

Respectfully submitted,

/s/ Luis C. Marini-Biaggi

Luis C. Marini-Biaggi
USDC No. 222301
Email: lmarini@mpmlawpr.com

Carolina Velaz-Rivero
USDC No. 300913
Email: cvelaz@mpmlawpr.com

MARINI PIETRANTONI MUÑIZ LLC

250 Ponce de León Ave., Suite 900
San Juan, Puerto Rico 00918
Tel: (787) 705-2171
Fax: (787) 936-7494

/s/ Peter Friedman

John J. Rapisardi
(Admitted Pro Hac Vice)
O'MELVENY & MYERS LLP
7 Times Square
New York, New York 10036
Tel: (212) 326-2000
Fax: (212) 326-2061

-and-

Peter Friedman (Admitted Pro Hac Vice)

1625 Eye Street, NW
Washington, D.C. 20006
Tel: (202) 383-5300
Fax: (202) 383-5414

Attorneys for the Puerto Rico Fiscal Agency and Financial Advisory Authority